MR # 305-276

DuPont Haskell Laboratory
for Health and Environmental Sciences
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June 13, 2007

Via Federal Express

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency,
1201 Constitution Ave., NW
Washington, D.C. 20460

CONTAIN NO CBI

Dear 8(e) Coordinator:

Cymoxanil (8EHQ-0791-1303) [4%] and
Manganese, [[1, 2-ethanediylbis[carbamodithioato]] (2-)]-, mixture with
[[1, 2-ethanediylbis[carbamodithioato]] (2-)] zinc (CAS # 8018-01-7) [40%]

This letter is to inform you of the results of a recently conducted acute oral toxicity study (up-and-down method) and an acute dermal sensitization study (Magnusson-Kligman Maximization Method) with the proprietary mixture referenced above.

Acute Oral Study:

Three fasted female rats were dosed at 1750 mg/kg and 7 fasted female rats were dosed at 5000 mg/kg. Two rats dosed at 5000 mg/kg were found dead or sacrificed *in extremis* on the day of dosing. The oral LD_{50} is 5000 mg/kg.

One rat dosed at 5000 mg/kg exhibited ataxia, hyperreactivity, lethargy, and low posture and was sacrificed *in extremis* on the day of dosing. A surviving rat dosed at 5000 mg/kg exhibited ataxia, hyperreactivity, lethargy, low posture, or high posture up to 4 days after dosing. Another surviving rat dosed at 5000 mg/kg exhibited abnormal gait, hyperreactivity, high posture, or salivation up to 6 days after dosing. Abnormal gait, lethargy, or low posture was observed up to 9 days after dosing in one more surviving rat dosed at 5000 mg/kg.

Acute Dermal Sensitization Study (Magnusson-Kligman Maximization Method):

The first induction phase involved 6 intradermal injections for each of 20 guinea pigs. These doses were comprised of pairs of injections of the test mixture in distilled water, the test mixture combined with Complete Freund's Adjuvant, and Adjuvant alone. The second phase of induction was conducted approximately one week later. The test mixture (56% w/w in distilled water) was applied topically to the 20 animals for 48 hours to the area encompassing the intradermal injection sites. Approximately 2 weeks later, the animals were challenged at concentrations of 19% w/w in distilled water and 6% w/w in distilled water.

Nineteen of 20 animals treated with 19% or 6% at challenge exhibited a sensitization response. According to the classification scheme of Kligman, the test substance is considered a Grade V extreme sensitizer.

Under these experimental conditions, the findings described above appear to be reportable, based upon the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,

A. Michael Kaplan

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs and Occupational Health

AMK/CC: clp
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